

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No. 23-cr-00251-AKH

**DECLARATION OF ALEX SPIRO**

Alex Spiro, hereby declares pursuant to 28 U.S.C. § 1746 and Local Criminal Rule 16.1 that:

1. I am a member in good standing of the Bar of the United States District Court for the Southern District of New York and a partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Charlie Javice in the above-captioned action.

2. I submit this declaration in support of Defendants' Motion to Compel Production of Rule 16 Discovery and *Brady/Giglio* Material.

3. Attached hereto as Exhibit A is a true and correct copy of the Government's discovery letter regarding the text of various subpoenas, dated August 30, 2023.

4. Attached hereto as Exhibit B is a true and correct copy of Bates-numbered document USAO\_00029207, email correspondence by and between James G. McGovern, Dina McLeod, et al, dated April 24, 2023, through May 11, 2023.

5. Attached hereto as Exhibit C is a true and correct copy of Bates-numbered document USAO\_00029389, email correspondence from Elizabeth Cochrane to Dina McLeod, et al, dated June 27, 2023.

6. Attached hereto as Exhibit D is a true and correct copy of Bates-numbered document JPMC\_00089664, titled Transaction Overview Template.

7. Attached hereto as Exhibit E is a true and correct copy of Deferred Prosecution Agreement, *United States v. JPMorgan Chase & Co*, 3:20-cr-00175-RNC (D. Conn. Sept. 29, 2020).

I declare under the penalty of perjury that the foregoing statements are true and correct.  
Executed in New York, New York on this 13<sup>th</sup> day of October, 2023.

/s/ Alex Spiro

Alex Spiro